

## REMARKS

Applicants wish to thank the Examiner for the careful consideration given to this case. In the Office Action claims 1-20 were rejected by the Examiner. More specifically:

- Claims 1-4, 6, 8, 9, 11-18 and 20 were rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Published Application No. 2002/0156812 (Krasnoiarov) in view of U.S. Published Application No. 2004/0109197 (Gardaz);
- Claim 5 was rejected under 35 U.S.C. §103(a) as being unpatentable over Krasnoiarov and Gardaz in view of U.S. Patent No. 6,184,878 (Alonso);
- Claim 7 was rejected under 35 U.S.C. §103(a) as being unpatentable over Krasnoiarov and Gardaz in view of U.S. Published Application No. 2002/0049842 (Huetsch); and
- Claims 10 and 19 were rejected under 35 U.S.C. §103(a) as being unpatentable over Krasnoiarov and Gardaz in view of U.S. Published Application No. 2003/0123622 (Gillford).

Upon entry of this Response, claims 1-20 will remain pending. For the reasons set forth below, Applicants request that the above-listed rejections be withdrawn.

### Claims 1-11

Applicants submit that claim 1 is nonobvious over Krasnoiarov in view of Gardaz because the cited references, whether considered alone or in combination, fail to teach or suggest each and every limitation of claim 1. *See* MPEP §2143 (stating that one of the elements of a *prima facie* case of obviousness under §103(a) is that the prior art references must teach or suggest all of the claim limitations). More particularly, Applicants submit that the combination of Krasnoiarov and Gardaz fails to teach or suggest, among other things, “compiling the converted deliverables for distribution over a plurality of delivery channels” and “posting the content to the delivery channels,” as recited in claim 1.

Krasnoiarov teaches a method for “satisfying a single request from a client for a plurality of content components derived from content hosted by a plurality of distinct, separately accessible component servers.” Krasnoiarov, Abstract. As the content components are received from the component servers, a main server “receives [each] content component, stores it, and awaits for remaining content components to be returned.” *Id.*, paragraph [0096]. Upon receiving

all of the content components, the main server “communicat[es] the resulting content, processed and assembled, to the user terminal from which the original request was issued.” *Id.*, paragraph [0098].

A delivery channel is identified in Applicant’s specification as a connection between a location where information is compiled and one or more presentation devices. *See* Specification, paragraphs [0007]-[0009]. Accordingly, claim 1 requires that information be distributed to a plurality of presentation devices because claim 1 requires distribution over a plurality of delivery channels. In contrast, Krasnoiarov assembles content including a plurality of different data types, but merely teaches distributing the resulting content **to a single user terminal over a single delivery channel** between the main server and the user terminal that issued the original request. As such, Krasnoiarov does not teach distribution over a plurality of delivery channels or posting content to the delivery channels. For at least that reason, Krasnoiarov cannot satisfy the limitations of claim 1.

Gardaz does not overcome the deficiencies of Krasnoiarov. Gardaz teaches a server that processes threads in parallel and converts files from one format to another, as stated by the Examiner. The system in Gardaz “provides an output image associated with [a] multi-resolution representation to the second computer when the web page is accessed by the second computer.” Gardaz, Abstract. In other words, Gardaz suffers from the same deficiency as Krasnoiarov in that it does not teach distribution over **a plurality of delivery channels** or posting content to **a plurality of delivery channels**, as required by claim 1.

As such, Applicants submit that independent claim 1 is nonobvious over the combination of Krasnoiarov and Gardaz because the cited references fail to teach or suggest each and every limitation of claim 1. *See* MPEP §2143. Applicants further submit that claims 2-11, which depend from and incorporate all of the limitations of claim 1, are also nonobvious over the cited references. *See* MPEP §2143.03 (stating that if an independent claim is nonobvious under 35 U.S.C. §103, then any claim depending therefrom is nonobvious). Accordingly, for the reasons set forth hereinabove, Applicants request that the §103(a) rejections associated with claims 1-11 be withdrawn.

### **Claims 12-20**

Applicants submit that claim 12 is nonobvious over Krasnoiarov in view of Gardaz because the cited references, whether considered alone or in combination, fail to teach or suggest each and every limitation of claim 12. *See* MPEP §2143. More particularly, Applicants submit that the combination of Krasnoiarov and Gardaz fails to teach or suggest, among other things, “compiling the converted deliverables for distribution over a plurality of delivery channels” and “posting the content to the delivery channels,” as recited in claim 12.

For the reasons stated above in reference to claim 1, Applicants submit that independent claim 12 is nonobvious over the combination of Krasnoiarov and Gardaz because the cited references fail to teach or suggest each and every limitation of claim 12. *See* MPEP §2143. Applicants further submit that claims 13-20, which depend from and incorporate all of the limitations of claim 12, are also nonobvious over the cited references. *See* MPEP §2143.03. Accordingly, for the reasons set forth hereinabove, Applicants request that the §103(a) rejections associated with claims 12-20 be withdrawn.

All of the stated grounds of rejection have been properly traversed and/or accommodated. Applicant therefore respectfully requests that the Examiner reconsider and withdraw all presently outstanding rejections. There being no other rejections or objections, Applicant respectfully requests that the current application be allowed and passed to issue.

If the Examiner believes for any reason that personal communication will expedite prosecution of this application, I invite the Examiner to telephone me directly.

### CONCLUSION

Although the Applicant believes no additional fees are due, the Commissioner is hereby authorized to charge deposit account No. 05-0426 for any fees that may be due in connection with this response.

Respectfully submitted,  
PEPPER HAMILTON LLP

  
\_\_\_\_\_  
Joseph T. Helmsen  
Registration No. 54,163

Pepper Hamilton LLP  
One Mellon Center, 50<sup>th</sup> Floor  
500 Grant Street  
Pittsburgh, PA 15219  
Telephone: 412.454.5000  
Facsimile: 412.281.0717  
Date: January 12, 2007